Comments to the International Civil Aviation Organization regarding the Forest Carbon Partnership Facility's application to the Carbon Offsetting and Reduction Scheme for International Aviation

The Rainforest Foundation UK (RFUK), Stay Grounded, Biofuelwatch, and Chris Lang from REDD-Monitor are calling on the International Civil Aviation Organisation (ICAO) to reject the Forest Carbon Partnership Facility's (FCPF) application to the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). Apart from our general objections to the concept of offsetting aviation's emissions, the FCPF has not demonstrated its ability to produce offsets that meet CORSIA's eligibility criteria on additionality, credible baselines, quantification and verification measures, permanence, leakage, double-counting, and do no net harm.

Additionally

The FCPF falls short of CORSIA's requirement on additionally because it is impossible to design a verifiable scenario of how much deforestation would have occurred without the FCPF's REDD+ programmes.[1] While it may appear easier to attribute changes in forest cover to specific interventions, this is based on huge assumptions and problematic baselines (see below). It is impossible to know how additional projects are unless without predicting the future of land use change in an area, which is highly dependent on fluctuations in commodity prices, natural disasters, income levels, availability of alternative energy sources, migration influxes, etc.

A further problem is that powerful interests will always exaggerate the impact of their interventions. For example, Wildlife Works Carbon, a private REDD+ project implementer in the Democratic Republic of Congo (DRC), sold credits on voluntary carbon markets even though it could not access a third of its concession due to local opposition to the project.

Inflated and inaccurate baselines

The FCPF has no clear rules for how baselines for deforestation levels should be created. In large jurisdictional REDD+ programmes there will inevitably be large differences in the processes driving deforestation and degradation in different parts of the jurisdiction, and hence one baseline cannot be appropriate for all of them.

This is certainly the case with the Mai Ndombe REDD+ programme in the DRC. The area closest to Kinshasa might well use Bas Congo, where deforestation is high, as a reference area but somewhere in the north-east or south-east of the province, where deforestation is low, should not. Hence, in Mai Ndombe, on average, baselines are hugely inflated because it is completely inconceivable that most of the province would, in the absence of a REDD+ project, experience deforestation similar to the rate in areas surrounding Kinshasa.

Similarly, Brazil's Forest Reference Emission Level used to calculate the country's allotted REDD+ results-based payments is based on peak levels of historical deforestation during the years 1996 to 2010 when deforestation reached 19,000 km^2 per year. Today, deforestation rates are closer to 10,000 km^2 having risen from 8,000km^2 since Bolsonaro came to power.[2] Hence, deforestation is now increasing but Brazil is still eligible to receive REDD+ results-based payments under their baseline.

[1] Karsenty, A. (2016). Comment on *Larry Lohmann: "The problem is not 'bad baselines' but the concept of counterfactual baselines itself".* [online] Available at: https://redd-monitor.org/2016/10/18/larry-lohmann-the-problem-is-not-bad-baselines-but-the-concept-of-counterfactual-baselines-itself/ [Accessed February 7, 2020].

[2] Butler, R. (2018). *Calculating deforestation figures for the Amazon*. [online] Available at: https://rainforests.mongabay.com/amazon/deforestation_calculations.html [Accessed February 2, 2020].

Quantification, monitoring, reporting and verification

The FCPF has been consistently unable to meet its own conditions for safeguards, monitoring, reporting, and quantification. After twelve years of implementation and millions of dollars invested (much of which has gone on overheads), the FCPF cannot point to a single gram of carbon saved. In order to meet deadlines, the FCPF has invariably diluted or ignored its rules, such as having to extend the lifetime of the Readiness Fund or signing Emission Reduction Payment Agreements before a final benefit-sharing plan has been agreed to. In short, there is no proof of concept.

As with the baseline scenarios, there are huge uncertainties with forest greenhouse gas estimates. The article published by Streck et al. on whether forest carbon credits should be included in offsetting schemes, which is largely positive on the topic and omits critical elements, cites the uncertainty estimate of forest and land-use initiatives at the European Union (EU) level at 34.3 percent.[3] This figure could probably be doubled or even tripled in the tropics, making the assessment of any reductions highly speculative to say the least. Even the EU figure would greatly exceed CORSIA EUC guidelines that offset credits should be based on measurement and quantification methods/protocols that lead to low uncertainties.

A further problem is who actually performs the measurement. As we have seen with now largely debunked certification initiatives such as the Forest Stewardship Council, there are often large conflicts of interests between the verifiers and those being verified. The FCPF verification guidelines do not include any explicit criteria on what constitutes a conflict of interest, but merely leaves a vague mandate that they shall “act impartially and shall avoid unacceptable conflicts of interest” without any definition of what constitutes “unacceptable”.[4] For example, in the Mai Ndombe REDD+ programme Wildlife Works Carbon, a project implementer, was also designated as one of the entities responsible for monitoring REDD+ projects in Mai Ndombe province where it operates.[5]

Permanence

There is no assurance that carbon credits generated under the FCPF will be permanent. First, the five-year project cycle compares very unfavorably to even the Clean Development Mechanism’s 30 year minimum requirement. Given that it takes 100 years for the majority (70 percent) of carbon in the atmosphere to be absorbed,[6][7] the FCPF should require that trees linked to carbon credits remain standing for at least 100 years or to sell 20T of carbon as a 1T carbon credit. Instead, trees linked to the FCPF’s carbon credits are only required to remain standing for the length of Emission Reduction Payment Agreements of just five years and each carbon credit is allegedly linked to 1T of carbon.

Second, depositing emission reductions into a buffer account is based on an already highly speculative accounting system. The suggestion that the risk of reversals can be mitigated in the context of jurisdictional REDD+ programmes through the development of new laws etc. ignores that in some countries, such as DRC and Brazil, there has actually been a weakening of REDD+ and forest

---

[3] Streck, C et al. (2019). *Should forest carbon credits be included in offsetting suches such as CORSIA?*. [online] Available at: https://www.climatefocus.com/publications/should-forest-carbon-credits-be-included-offsetting-schemes-such-corsia [Accessed February 4, 2020].

[4] Forest Carbon Partnership Facility (2019). *Verification Guidelines.* [online] Available at: https://www.forestcarbonpartnership.org/sites/fcp/files/2019/Sep/FCPF%20Verification%20Guidelines_2019_Ver01.pdf [Accessed February 4, 2020].

[5] Photo evidence available upon request.

[6] The remaining 20 percent takes tens to hundreds of thousands of years to be absorbed.

[7] NASA (2011). *Effects of Changing the Carbon Cycle.* [online] Available at: https://earthobservatory.nasa.gov/features/CarbonCycle/page5.php [Accessed February 4, 2020].

protection laws. Moreover, even if there were more stringent laws in place, does this mean that the reductions generated would cease to be additional? The conditions that would make a project additional (lack of regulation and governance to protect forests) are the exact reason why a forestry intervention would not be effective. This is in contrast to small-scale renewables like solar, where the national government has less sway on the durability of the project.

Third, the going rate of $5 per ton is not going to incentivise change.

Leakage

The FCPF suggests that jurisdictional REDD+ programmes diminish the risk of displacement. These assumptions are all purely guesswork and wishful thinking. There has never been a proper study of drivers of deforestation for certain tropical forest areas, such as the Congo Basin, so there is no real understanding of what is causing deforestation now, let alone what might cause it in the future.

Double-counting

Jurisdictional REDD+ programmes are also touted as the solution to avoid double-counting. Despite still not having produced a single carbon credit, there is little evidence the FCPF or its jurisdictional approach will be able to prevent double-counting carbon credits.

For example, in the Mai Ndombe REDD+ programme, there are at least two carbon credit systems that will be used in the programme area, including Verified Carbon Standard (VCS) and Congolese Emission Reductions (CER) with no explanation of how multiple verification systems will avoid double-counting. To add, the credibility of VCS to generate verifiable carbon credits is dubious. From 2009 to 2012, the Suirí REDD+ project in Brazil generated 299,895 carbon credits as verified by VCS, of which 48,366 should have gone to a buffer account in case of future deforestation. However, between 2013 and 2017 deforestation increased in the project area due to illegal logging, diamond and gold mining, emitting 452,554 tonnes of CO_2 above the baseline scenario. Despite this reversal of emission reductions, VCS[8] refused to put buffer credits on hold and continued to sell carbon credits.[9]

Furthermore, Article 6 of the Paris Agreement that outlines the stipulations for trading carbon credits is still not ratified. The FCPF's Emission Reduction Payment Agreements thus risk bypassing international conventions and potentially retroactively recalculating the number of carbon credits in order to be in line with Article 6.

Net Harm

The FCPF's verification guidelines do not require monitoring the social impacts of REDD+ programmes. The Mai Ndombe REDD+ programme in DRC illustrates the necessity of including such a clause given that the programme was established without the consent of communities, sparked serious inter-communal conflict, and stripped communities of the opportunity to obtain land rights.[10]

---

[8] In February, 2018 VCS changed its name to Verra.

[9] Lang, C (2018). *Brazil: The Suruí REDD project has been suspended indefinitely*. [online] Available at: https://redd-monitor.org/2018/09/20/brazil-the-surui-redd-project-has-been-suspended-indefinitely/ [Accessed February 4, 2020].

[10] Further evidence available upon request.